

**REMARKS**

In response to the Office Action mailed on June 16, 2004, claims 1, 4, 5, 7, 8, 11, 14, 15, 17 and 19 have been amended. Claims 1, 4, 5, 7, 8, 11, 14, 15, 17 and 19 are currently pending in the application, of which claims 1, 5 and 15 are independent claims.

In view of the above Amendments and the following Remarks, Applicant respectfully requests reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

***Rejections Under 35 U.S.C. § 112, first paragraph***

Claims 1, 5 and 15 stand rejected under 35 U.S.C. § 112, first paragraph as containing subject matter which was not described in the specification. Particularly, the Examiner stated that the limitation "... the image data is compressed in a lossless manner" is not described in the specification. Applicant respectfully traverses this rejection for at least the following reasons.

The specification describes "The focus control unit 80 also *compresses* the image data stored in the frame memory unit 50 ... and stores the compressed image data in the flash memory card unit 60 by the image signal processing unit 70. Further, the focus control unit 80 *restores the compressed image data* in the flash memory card unit 60 and stores the frame memory unit 50 as needed" (Page 4, lines 8-13). Thus, the specification describes compressing the image data *in a manner that the image data can be restored*, which is also known as "lossless" type compression.

Also, it should be noted that the Examiner previously stated "The Examiner understands the applicant trying to argue that the "compression" is *lossless form* which the image file is

identical to the original file before compression. However, the limitation in the claims is only required for storing “the compressed image data” and does not define the means “compression” is lossless compression form ...” (Page 2, Office Action mailed on March 18, 2004). This suggests that it was clear to the Examiner that the compression of the claimed invention is a lossless-type compression.

For these reasons, it is submitted that the limitation “... the image data is compressed in a lossless manner” was readily apparent from the specification. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. § 112, first paragraph rejection of claims 1, 5 and 15.

***Rejections Under 35 U.S.C. § 103***

Claims 1, 4, 5, 7, 8, 11, 14, 15, 17 and 19 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U. S. Patent No. 5,625,415 issued to Ueno, *et al.* (“Ueno”) in view of France Patent Publication No. 2674036 issued to Mrejen (“Mrejen”) and further in view of U. S. Patent No. 5,432,871 issued to Novik (“Novik”). Applicant respectfully traverses this rejection for at least the following reasons.

In the Office Action, the Examiner admitted that “Ueno does not explicitly state wherein the image data can also be compressed in a lossless manner instead of only compressed in a lossy manner (reduction)” (Office Action, page 4). In this regard, the Examiner stated “The Novik reference discloses in Figure 2, a digital image processing system comprises a compression process (116) be able to use both the lossy data compression method for a wide image ... and the lossless data compression method for the image data interest selected by the user”

On this basis, the Examiner asserted “The Novik reference is an evidence that one of ordinary skilled in the art ... to see more advantage for a digital image processing system having more flexible options to compress image data base on the user needed .... For that reason, it would have been obvious to see the image data that can also be compressed in a lossless manner and store in the second memory unit when user want to keep the quality of image data disclosed by Ueno” (Office Action, pages 4-5). This assertion is respectfully disagreed with.

With respect to claims 1 and 4, amended independent claim 1 recites:

“...  
a first memory unit storing *image data corresponding the entire image*;  
...  
a focus control unit ... compressing the image data *in a lossless manner*; and  
a second memory unit storing the compressed image data”.

Thus, in claim 1, the image data corresponding to the *entire* image is compressed in a lossless manner and stored in the second memory unit”.

In this regard, Novik discloses compressing images in a lossy form and transmitting the compressed images. After receiving these compressed images, the end user reviews the images and selects the position of the window of interest. Supplemental image data which provides enough image data is transmitted back to the end user. However, “ the supplemental image data is provided ... *only for the window of interest*” (Novik, column 10, lines 45-47).

Although Novik discloses compressing an image in a lossless format (column 10, lines 55-56), such lossless compression is utilized only for the “window of interest” portion of an

image, not the entire image. Thus, Novik fails to disclose or suggest compressing image data corresponding to *the entire image* in a lossless manner, as claimed.

Since none of the cited references discloses or suggests this claimed feature, it is submitted that claim 1 is patentable over Ueno, Mrejen and Novik. Claim 4 that is dependent claim 1 would be also patentable at least for the same reason.

With respect to claims 5, 7, 8, 11 and 14, amended independent claim 5 recites:

“...  
a first image storage storing image data corresponding to  
*the entire image*;  
...  
a focus control unit ... *compressing the image data in a  
lossless manner*; and  
a second image storage storing the compressed image  
data...”

As previously mentioned, none of the cited references discloses or suggest compressing the image data corresponding to the entire image. Thus, it is submitted that claim 5 is patentable over the cited references. Claims 7, 8, 11 and 14 that are dependent from claim 5 would be also patentable at least for the same reason.

With respect to claims 15, 17 and 19, amended independent claim 15 recites:

“...  
(b) storing image data corresponding to *the entire  
subject*;  
...  
(g) *compressing the digital image data in a lossless  
manner*;  
(h) storing the compressed digital image data; and  
(i) restoring the compressed digital image data as  
needed.”

As previously mentioned, none of the cited references discloses or suggest compressing the image data corresponding to the entire image. Thus, it is submitted that claim 15 is patentable over the cited references. Claims 17 and 19 that are dependent from claim 15 would be also patentable at least for the same reason.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. § 103(a) rejection of claims 1, 4, 5, 7, 8, 11, 14, 15, 17 and 19.

***Other Matters***

In addition to the aforementioned amendments, claims 1, 4, 5, 7, 8, 11, 14, 15, 17 and 19 have been further amended for informality correction, better wording and clarification.


**CONCLUSION**

Applicant believes that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicant's undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

  
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